

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**Case No. 21-cr-40/TNM**

**TRISTAN CHANDLER STEVENS,**

**Defendant.**

\_\_\_\_\_ /

**TRISTAN STEVENS' MOTION TO MODIFY  
CONDITIONS OF PRETRIAL RELEASE**

The defendant, TRISTAN CHANDLER STEVENS, by and through his undersigned counsel, moves this Court pursuant to 18 U.S.C. § 3142 to modify his conditions of release by lifting the requirement that he submit to GPS monitoring. In support, counsel states the following:

1. Mr. Stevens was arrested at his home in Pensacola, Florida, on February 5, 2021, and later released on conditions to include GPS monitoring. ECF Nos. 5, 33. He is currently charged with ten counts in the Fifth Superseding Indictment in this matter. ECF No. 179.

2. Mr. Stevens is a college student with no prior criminal history. Northern District of Florida Pretrial Services Officer Kailey Minnick reports that Mr. Stevens has fully complied with every condition of release during his time on supervision. ECF No.

276. Officer Minnick defers to the District of Columbia Pretrial Services Office regarding any modification of Mr. Stevens' conditions of release.

3. District of Columbia Pretrial Services Officer John Copes defers to the Court regarding any modification of Mr. Stevens' conditions of release.

4. Mr. Stevens' track record during his more than fourteen months on pretrial supervision suggests that less restrictive conditions, namely the removal of his GPS ankle monitor, would be sufficient to assure his appearance in court as well as the safety of the community.

5. If the Court requires a hearing on this matter, Mr. Stevens requests that it be held via VTC prior to the July 22, 2022, pretrial conference.

WHEREFORE, the defendant, TRISTAN CHANDLER STEVENS, respectfully requests that this Court grant his motion and amend his release order to remove the specific condition of GPS monitoring.

RESPECTFULLY SUBMITTED this 25th day of April 2022.

/s/ Lauren Cobb  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 25, 2022, I will electronically file the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/ Lauren Cobb

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